

FILED

OCT 17 2007

**Board of Vocational Nursing
and Psychiatric Technicians**

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Attorneys for Complainant

**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2004-458

JECK CELAJE
485 Juniper St.
La Verne, CA 91750

A C C U S A T I O N

Vocational Nurse License No. VN 204022

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this
Accusation solely in her official capacity as the Executive Officer of the Board of Vocational
Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs.

2. On or about May 2, 2003, the Board issued Vocational Nurse License No.
VN 204022 to Jeck Celaje (Respondent). The Vocational Nurse License was in full force and
effect at all times relevant to the charges brought herein and expired on September 30, 2004.

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3. This Accusation is brought before the Board, under the authority of the

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4. Section 2875 of the Business and Professions Code (Code) provides, in

5. Section 118(b) of the Code provides, in pertinent part, that the expiration

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(f) Conviction of a crime substantially related to the qualifications, functions,

7. Section 490 of the Code provides, in pertinent part, that the Board may

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1 act shall be considered to be substantially related to the qualifications, functions or duties of a
2 licensed vocational nurse if to a substantial degree it evidences present or potential unfitness of a
3 licensed vocational nurse to perform the functions authorized by his license in a manner
4 consistent with the public health, safety, or welfare.”

5 9. Section 125.3 of the Code provides, in pertinent part, that the Board may
6 request the administrative law judge to direct a licentiate found to have committed a violation or
7 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
8 and enforcement of the case.

9 CAUSE FOR DISCIPLINE

10 (Conviction of a Substantially Related Crime)

11 10. Respondent is subject to disciplinary action under section 2878,
12 subdivision (f) and 490, in conjunction with California Code of Regulations, title 16, section
13 2521, in that Respondent has been convicted of a crimes substantially related to the
14 qualifications, functions or duties of a licensed vocational nurse, as follows:

15 a. On or about June 4, 2003, Respondent was convicted by the Court on a
16 plea of nolo contendere for violating one count of Penal Code section 12031, subdivision
17 (a)(2)(F), a felony (carrying a loaded firearm), in the Superior Court of California, County of
18 Los Angeles, Pomona Judicial District, Case No. KA062174 entitled *The People of the State of*
19 *California v. Jeck Avengoza Celaje*.

20 b. The circumstances surrounding the conviction are that on or about June 2,
21 2003, Respondent unlawfully possessed a loaded firearm.

22 PRAYER

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein
24 alleged, and that following the hearing, the Board issue a decision:

25 1. Revoking or suspending Vocational Nurse License No. VN 204022, issued
26 to Jeck Avengoza Celaje;

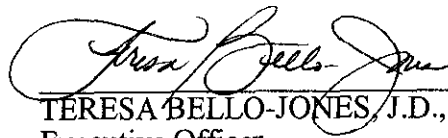
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2. Ordering Jeck Celaje to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: October 17, 2007.



TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer
Board of Vocational Nursing and Psychiatric Technicians
State of California
Complainant

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jz (12/20/06)

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